

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

LEAGUE OF CONSERVATION VOTERS <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	No. 3:17-cv-00101-SLG
	)	
DONALD J. TRUMP <i>et al.</i> ,	)	
	)	
<i>Defendants,</i>	)	
	)	
AMERICAN PETROLEUM INSTITUTE and STATE	)	
OF ALASKA,	)	
	)	
<i>Intervenor-Defendants.</i>	)	
	)	

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**DECLARATION OF GENE KARPINSKI**

I, Gene Karpinski, hereby declare as follows:

1. I am the President of the League of Conservation Voters (LCV) and have been since 2006. I am familiar with LCV's mission, purpose, and activities and familiar with all aspects of LCV's mission and activities as they relate to the Atlantic Ocean and the Arctic Ocean in Alaska, including the Chukchi and Beaufort seas and the adjoining onshore areas.

2. LCV works to turn environmental values into national, state and local priorities. LCV advocates for sound environmental laws and policies, holds elected officials accountable for their votes and actions, and works to elect pro-environment candidates who will champion our priority issues. LCV is committed to stopping the expansion of offshore drilling, in particular to largely undeveloped areas such as the Arctic and Atlantic Oceans, to preserve coastal economies, ways of life, and sensitive marine life, and to accelerate the shift from dirty sources of energy to cleaner sources to combat climate change before it's too late. We educate policymakers, our members, and the media to achieve our policy goals.

3. LCV has a long history of engagement to stop the expansion of offshore drilling to the Arctic and Atlantic Oceans. We have engaged in numerous public processes to inform governmental decision-making on offshore drilling in the Arctic and Atlantic Oceans. For example, we submitted comments to the draft Programmatic Environmental Impact Statement for the Proposed 2017-2022 Outer Continental Shelf Oil and Gas Leasing Program in support of prohibiting new leasing in the Arctic Ocean, and we specifically urged the Department of the Interior to exclude Beaufort Sea leasing. We also submitted comments to the 2019 – 2024 National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program opposing the expansion of offshore drilling, including opposing leasing in all waters off Alaska. We have also activated our members on numerous occasions, including in the context of the 2019-2024

National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program, to submit comments to the Bureau of Ocean Energy Management in opposition to new offshore drilling in both the Arctic and Atlantic Oceans. LCV engaged in advocacy in support of President Obama's decision to withdraw certain areas of the Outer Continental Shelf from oil and gas leasing, including educating decision-makers in the executive branch, sponsoring advertisements, and persuading members of Congress to sign letters to the president in support of this action.

4. LCV has nearly two million members, with more than 3,000 members based in Alaska and nearly 550,000 members in states located on the Atlantic seaboard. LCV members are from all walks of life, and include birders, scientists, hikers, outdoor enthusiasts, and small business owners. LCV's staff and members rely on LCV to represent their interests in issues affecting the Arctic and Atlantic Oceans—including the Beaufort and Chukchi Seas—the adjoining onshore areas, and the wildlife species that inhabit those areas. We communicate with our members on offshore drilling issues via regular email updates, postal mailings, and posts to our social media channels. Many of these communications allow our members to sign petitions, submit official comments, and otherwise share their views on Arctic and Atlantic drilling, and we provide a conduit to amplify their voices with decision-makers in Washington.

5. LCV is committed to protecting the Arctic and Atlantic Oceans from the risks of offshore drilling to the regions' people, wildlife, and climate. These areas are largely untouched by oil development and are home to sensitive marine and other wildlife. In the Arctic, we have a long history of working to protect the pristine Arctic National Wildlife Refuge, adjacent to the Beaufort Sea. The Arctic is also ground zero for the impacts of climate change, which would be exacerbated by additional oil and gas development. We also have a long history of working to protect the Atlantic Ocean, an economic engine that generates billions in economic activity,

supports hundreds of thousands of jobs in an array of industries all along the East Coast, and provides endless opportunity for recreation. As an example, we have worked to bring attention to the network of thirty-one deep-water canyons that play host to myriad and diverse marine species. Our members rely on us to be their voice to advance our shared values.

6. President Trump's attempted revocation of President Obama's withdrawal of areas in the Arctic and Atlantic Ocean would harm LCV and LCV members' shared interest in protecting the regions' people, wildlife, and climate. Oil and gas development in these areas would bring industrialization and increase the risk of catastrophic oil spills that would negatively and irrevocably impact our members and our organization's mission to preserve marine life in the area. Opening up these areas to fossil fuel development—at a time when we should be accelerating our transition to cleaner sources of energy—signals to the world a lack of commitment to addressing climate change, thus harming our members' and LCV's mission to solve this problem before it's too late.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Dated:

6/6/18

By:

  
Gene Karpinski, President  
League of Conservation Voters